northwest clean air agency

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Northwest Clean Air Agency (NWCAA) hereby issues Order of Approval to Construct (OAC) #1064

Project Summary: The BP Clean Fuels Project is comprised of the construction and operation of a new hydrogen plant (#2 Hydrogen Plant) and new diesel hydro-desulfurization (#3 DHDS) processing unit. The #2 Hydrogen Plant is designed to produce 40 million standard cubic feet per day (MMSCFD) of hydrogen and purify an additional 4 MMSCFD of hydrogen. New emissions units associated with the project include a Steam Methane Reformer (SMR) Furnace with a rated heat input capacity of 496 million Btu per hour (MMBtu/hour) higher heating value (HHV), an elevated flare used to combust off specification gasses during startup, shutdown and upset conditions at the #2 Hydrogen Plant, and a #3 DHDS Charge Heater with a rated heat input capacity of 28 MMBtu/hour HHV. The SMR Furnace is equipped with ultra-low nitrogen oxide burners (ULNB) and selective catalytic reduction (SCR). The #3 DHDS Charge Heater is equipped with ULNB. Fugitive emissions from process equipment located at the #2 Hydrogen Plant and #3 DHDS Unit are subject to 40 CFR 60 Subpart GGGa. This new source performance standard requires the implementation of an enhanced leak detection and repair program at each unit that is considered equivalent to best available control technology.

The Clean Fuels Project includes retrofitting the existing 1st Stage Fractionator Reboiler at the Hydrocracker Unit with ULNB to reduce nitrogen oxide emissions. This separate but related action is being permitted under NWCAA OAC #1067. The Clean Fuels Project requires a Prevention of Significant Deterioration permit (PSD-10-01) for PM_{10} emissions.

APPLICANT

Jeff M. Pitzer
Business Unit Leader
BP Cherry Point Refinery
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Blaine, WA 98230
NOC Contact: Steve Mrazek

OWNER

BP West Coast Products, LLC
BP Cherry Point Refinery
4519 Grandview Road
Blaine, WA 98230

FACILITY LOCATION:

BP Cherry Point Refinery

4519 Grandview Road, Blaine, Washington 98230

Note that in addition to other applicable rules and regulations, this project is subject to applicable portions of the following federal regulations:

New Source Performance Standards

- 40 CFR 60 Subpart A - General Provisions
- 40 CFR 60 Subpart Ja - Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007
- 40 CFR 60 Subpart GGGa - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 [references portions of Subpart VVa].
- 40 CFR 60 Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems

National Emission Standards for Hazardous Air Pollutants/Maximum Achievable Control Technology Standards

- 40 CFR 63 Subpart A - General Provisions
- 40 CFR 63 Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries, which states that wastewater streams subject to 40 CFR Part 60 Subpart QQQ only comply with Subpart CC. The regulation also references 40 CFR Part 60 Subpart VVa regarding equipment leaks.
- 40 CFR 63 Subpart EEEE - Organic Liquids Distribution
- 40 CFR 61 Subpart FF - National Emission Standard for Benzene Waste Operations

As authorized by the Northwest Clean Air Agency Regulation Section 300, this Order subjects the following emission units to the conditions set forth herein:

#2 Hydrogen Plant SMR Furnace

1. Heat input to the SMR Furnace shall not exceed 496 MMBtu/hour HHV, based on a 365-day rolling average.

2. Fuels combusted in the SMR Furnace shall be limited to natural gas and pressure swing absorption (PSA) residual off-gas.

3. Visible emissions from the SMR Furnace stack shall not exceed five percent (5%) opacity for more than three minutes in any consecutive sixty-minute period as determined by Washington State Department of Ecology Method 9A.

4. Emissions of fine particulate matter ($PM_{2.5}$, filterable and condensable) from the SMR Furnace shall not exceed any of the following limits:

   a. 4.96 lb/hour

   b. 0.010 lb/MMBtu

   Compliance with this condition shall be determined by the average of three test runs conducted during periodic source testing required under Condition 11 of this Order.

5. Emissions of nitrogen oxides (NOx) from the SMR Furnace shall not exceed any of the following limits;

   During normal operations with SCR

   a. 3.54 lb/hour, 24-hour rolling average.

   During maintenance activities without SCR

   b. 17.4 lb/hour, 24-hour rolling average.

   Continuous compliance with this condition shall be determined within 180 days of startup of the SMR Furnace by operating a certified continuous emission monitoring system (CEMS) for nitrogen oxides, oxygen and flue gas flow. The CEMS shall be installed, calibrated, maintained and operated in accordance with appropriate specifications of 40 CFR 60 Appendices B and F, and NWCAA Section 367 and Appendix A.

6. Emissions of carbon monoxide (CO) from the SMR Furnace shall not exceed the following limit:

   a. 4.31 lb/hour, 24-hour rolling average

   Continuous compliance with this condition shall be determined within 180 days of startup of the SMR Furnace by operating a certified continuous emission monitoring system (CEMS) for carbon dioxide, oxygen and flue gas flow. The CEMS shall be installed, calibrated, maintained and operated in accordance with appropriate specifications of 40 CFR 60 Appendices B and F, and NWCAA Section 367 and Appendix A.

7. Emissions of sulfur dioxide (SO_2) from the SMR Furnace shall not exceed any of the following limits:

   a. 2.83 lb/hour, 24-hour rolling average

   b. 6.3 tons, 12-month rolling cumulative

   Continuous compliance with this condition shall be determined within 180 days of startup of the SMR Furnace by operating a certified continuous emission monitoring system (CEMS) for sulfur dioxide, oxygen and flue gas flow. The CEMS shall be installed, calibrated, maintained and operated in accordance with appropriate specifications of 40 CFR 60 Appendices B and F, and NWCAA Section 367 and Appendix A.

8. Emissions of volatile organic compounds (VOC) from the SMR Furnace shall not exceed any of the following limits;

   a. 2.67 lb/hour

   b. 0.0054 lb/MMBtu

   Compliance with this condition shall be determined by the average of three test runs conducted during source testing required under Condition 11 of this Order.

9. Emissions of ammonia (NH_3) from the SMR Furnace shall not exceed any of the following limits;

   a. 10 (1.0×10^1) ppm by volume, dry basis, corrected to three percent oxygen, hourly average

   b. 2.62 lb/hour

   Compliance with this condition shall be determined by the average of three test runs conducted during source testing required under Condition 11 of this Order.

10. Continuous compliance with Condition 9 of this Order shall be demonstrated by developing and implementing an ammonia emissions monitoring plan. The plan shall establish a predictive relationship between the SMR Furnace operation, SCR parameters and ammonia emissions. The ammonia monitoring plan shall be submitted to the NWCAA at least 30 days prior to startup of the #2 Hydrogen Plant. A final plan shall be submitted to the NWCAA within 90 days after conducting the initial ammonia compliance test required under Condition 11 of this Order. The final plan shall contain source test results and the established relationship between the SMR Furnace operation, SCR parameters and ammonia emissions. The plan shall define QA/QC procedures and corrective actions to be taken when parameter monitoring indicates that any emission limit in Condition 9 of this Order may be exceeded. The plan shall include a requirement to source test the SMR Furnace as soon as practical if parameter monitoring indicates that an ammonia limit may be exceeded due to a condition that cannot be corrected within 24 hours.

    The plan shall be reevaluated after each periodic source test for ammonia and shall be improved and revised accordingly with revisions submitted to the NWCAA within 90 days of source testing. As an alternative to a plan based on predictive monitoring of operating parameters, a plan may be developed and/or revised that is based on direct continuous emissions monitoring (CEM) of ammonia from the SMR Furnace stack.

11. An initial source test shall be conducted on SMR Furnace within 120 days of initial firing to demonstrate compliance with Conditions 4, 5, 6, 7, 8 and 9 of this Order. Thereafter, compliance with Conditions 4, 8 and 9 of this Order shall be demonstrated by conducting annual testing within eleven to thirteen months of the anniversary of the initial test. During source testing, the SMR Furnace shall be fired at a rate that is as close to its maximum capacity as practical. If the furnace is fired at a rate that is less than 90% of its maximum capacity, the reason shall be explained in the source test report.

    All testing shall be conducted in accordance with 40 CFR 60 Appendix A, Methods 1, 2, 3A and 4, and NWCAA Section 367 and Appendix A. The following test methods shall be used unless an alternative method is approved in advance by the NWCAA.

    a. $PM_{2.5}$ - 40 CFR 60 Appendix A, Method 5 and Method 202, or US EPA Other Test Methods (OTM) 27 and 28

    b. NOx - 40 CFR 60 Appendix A, Method 3A and Method 7E

    c. CO - 40 CFR 60 Appendix A, Method 3A and Method 10, 10A or 10B

    d. SO_2 - 40 CFR 60 Appendix A, Method 6C

e. VOC - 40 CFR 60 Appendix A, Method 18 or Method 25

f. Ammonia - BAAQMD Method ST-1B

12. SMR Furnace operation without SCR shall not exceed 100 hours, as a cumulative 12-month rolling total.

13. The owner/operator shall maintain the following records for the #2 Hydrogen Plant SMR Furnace. These records shall be maintained for a period of no less than five years from the date of generation and shall be readily available for review by the NWCAA.

a. Heat input in MMBtu/hour HHV, as daily and 365-day rolling averages,

b. Exhaust flow rate in actual and standard cfm, as hourly and 24-hour averages,

c. NOx, CO and SO_2 emissions from CEMS data in ppmvd at 3% oxygen, as hourly and 24-hour averages,

d. NOx, CO and SO_2 emissions from CEMS data in lb/hour, as hourly and 24-hour averages,

e. SO_2 emissions in cumulative tons per month, and 12-month rolling total,

f. Time, date and duration of each event that the SMR Furnace is operated without SCR. The record shall describe the reason that the SCR system was not operated, and

g. Number of hours that the SMR Furnace is operated without SCR, as a cumulative 12-month rolling total.

<u>#2 Hydrogen Plant Flare</u>

14. The #2 Hydrogen Plant Flare pilot fuel and header sweep gas shall be limited to natural gas.

15. Visible emissions from #2 Hydrogen Plant Flare shall not exceed five percent (5%) opacity for more than three minutes in any consecutive sixty-minute period as determined by Washington State Department of Ecology Method 9A.

16. The gas flow rate to the #2 Hydrogen Plant Flare shall be continuously monitored using a flow meter compensated for pressure and temperature. The flow meter shall be used to determine the velocity in meters per second (mps) and volumetric flow in standard cubic feet per minute (scfm) of gasses routed to the flare.

17. Gas combusted in the #2 Hydrogen Plant Flare shall be sampled and analyzed on a weekly basis for composition using UOP Laboratory Test Method 539-97 "Gas Analysis by Gas Chromatography". The gas composition shall be used to determine the heat content of the gas in terms of Btu HHV per standard cubic foot (Btu/scf) and to determine the EPA Method 19 Fd Factor of the gas.

18. The owner/operator shall maintain the following records for the #2 Hydrogen Plant Flare. These records shall be maintained for a period of no less than five years from the date of generation and shall be readily available for review by the NWCAA.

    a. Velocity at the flare tip in mps of gas combusted, as an hourly average,

    b. Flow rate in scfm of gas combusted, as an hourly average,

    c. The heat content in Btu/scf of gas combusted, as represented by weekly gas composition sampling, and

    d. EPA Method 19 Fd Factor of the gas combusted, as represented by weekly gas composition sampling.

#3 DHDS Unit Charge Heater

19. Fuels combusted in the #3 DHDS Charge Heater shall be limited to natural gas and refinery fuel gas.

20. Heat input to the #3 DHDS Charge Heater shall not exceed 28 MMBtu/hour HHV, based on a 365-day rolling average.

21. Visible emissions from the #3 DHDS Charge Heater shall not exceed five percent (5%) opacity for more than three minutes in any consecutive sixty-minute period as determined by Washington State Department of Ecology Method 9A.

22. The hydrogen sulfide (H_2S) content of fuel combusted in the #3 DHDS Charge Heater shall not exceed the following limit.

    a. 50 (5.0×10^1) ppm, 24-hour rolling average.

    The refinery fuel gas combusted in the #3 DHDS Charge Heater shall be continuously monitored for H_2S content. The monitor shall be installed, and operated in accordance with 40 CFR 60 Subpart J, Subpart A and Appendix F, and NWCAA Section 367 and Appendix A.

23. Emissions of fine particulate matter ($PM_{2.5}$, filterable and condensable) from the #3 DHDS Charge Heater shall not exceed any of the following limits:

    a. 0.28 lb/hour

    b. 0.010 lb/MMBtu

    Compliance with this condition shall be determined by the average of three test runs conducted during periodic source testing required under Condition 27 of this Order.

24. Emissions of nitrogen oxides (NOx) from the #3 DHDS Charge Heater shall not exceed any of the following limits.

    a. 0.98 lb/hour

b. 0.035 lb/MMBtu

Compliance with this condition shall be determined by the average of three test runs conducted during periodic source testing required under Condition 27 of this Order.

25. Emissions of carbon monoxide (CO) from the #3 DHDS Charge Heater shall not exceed any of the following limits.

a. 1.03 lb/hour

b. 0.037 lb/MMBtu

Compliance with this condition shall be determined by the average of three test runs conducted during periodic source testing required under Condition 27 of this Order.

26. Emissions of sulfur dioxide (SO_2) from the #3 DHDS Charge Heater shall not exceed any of the following emission limits.

a. 3.04 lb/hour

b. 0.11 lb/MMBtu

c. 3.2 tons, 12-month rolling cumulative

Compliance with a. and b. of this condition shall be determined by the average of three test runs conducted during periodic source testing required under Condition 27 of this Order. Compliance with c. of this condition shall be determined by monthly total sulfur sampling of the fuel gas as required by Condition 29 of this Order.

27. An initial source test shall be conducted on the #3 DHDS Charge Heater within 120 days of initial firing to demonstrate compliance with Conditions 23, 24, 25 and 26 of this Order. Thereafter, testing shall be conducted within 36 months of the most recent test. During source testing, the #3 DHDS Charge Heater shall be fired at a rate that is as close to its maximum capacity as practical. If the heater is fired at a rate that is less than 90% of its maximum capacity, the reason shall be explained in the source test report.

All testing shall be conducted in accordance with 40 CFR 60 Appendix A, Methods 1, 2, 3A and 4, and NWCAA Section 367 and Appendix A. The following test methods shall be used unless an alternative method is approved in advance by the NWCAA.

a. $PM_{2.5}$ - 40 CFR 60 Appendix A, Method 5 and Method 202, or US EPA Other Test Methods (OTM) 27 and 28

b. NOx - 40 CFR 60 Appendix A, Method 3A and Method 7E

c. CO - 40 CFR 60 Appendix A, Method 3A and Method 10, 10A or 10B

d. SO_2 - 40 CFR 60 Appendix A, Method 3A and Method 6C

28. Within 180 days of initial startup of the #3 DHDS Charge Heater, a continuous sulfur dioxide (SO_2) emission monitoring program shall be conducted on the #3 DHDS Charge Heater stack. The program shall monitor SO_2 emissions from the #3 DHDS Charge Heater

with a certified CEMS for at least three Delayed Coker drum cycles. This temporary, one-time only, monitoring program shall be used to examine the influence of the Delayed Coker drum cycles on the total sulfur content of the main refinery fuel gas system. Within 60 days of completing monitoring required by this condition, a report shall be submitted to the NWCAA that includes the hourly SO_2 ppm per volume, dry basis, corrected to 3% oxygen values accompanied by a summary of findings on the effect of the delayed coking process on total sulfur composition of the refinery's main fuel gas system. The monitoring and reporting requirements of this condition may be revised or modified with advanced written approval from the NWCAA.

29. Fuel gas combusted in the #3 DHDS Charge Heater shall be analyzed once per calendar month for total sulfur content using ASTM Test Method D-5504, or alternative method approved in advance by the NWCAA. A minimum of three samples shall be taken for each monthly sampling event and samples shall be taken at least one hour apart.

30. An operating and maintenance (O & M) manual for the #3 DHDS Charge Heater ultra-low NOx burners shall be maintained on site.

31. The owner/operator shall maintain the following records for the #3 DHDS Charge Heater. These records shall be maintained for a period of no less than five years from the date of generation and shall be readily available for review by the NWCAA.

    a. Heat input in MMBtu/hour HHV, as daily and 365-day rolling averages.

    b. Results of monthly sampling for total sulfur in fuel gas combusted in the heater.

    c. SO_2 emissions from the heater in cumulative tons per each 12-month rolling period.

Notifications

32. The owner/operator shall notify the NWCAA in writing of the following events. Each notification shall be postmarked no later than 15 days following the date of the event.

    a. Commencement of construction date for the Clean Fuels Project. For the purpose of this notification, commencement of construction refers to construction of the #2 Hydrogen Plant and #3 DHDS and does not include any notices relevant to the Hydrocracker 1st Stage Fractionator Reboiler ULNB Project approved under NWCAA OAC #1067.

    b. Initial firing date of the #2 Hydrogen Plant SMR Furnace.

    c. Initial firing date of the #3 DHDS Charge Heater.

Project Startup

33. Startup of the #2 Hydrogen Plant or the #3 DHDS Unit shall not commence prior to completion of the Hydrocracker 1st Stage Fractionator Reboiler ULNB Retrofit Project approved under NWCAA OAC #1067.

On September 15, 2010, the Agency issued a Mitigated DNS for the project, based on conditions enumerated in the MDNS and set forth below. The following mitigation measures (34 - 42) are conditions of approval imposed pursuant to RCW 43.21C.060 and Sections 155.8 and 155.13 of the Agency's Regulations. These conditions are enforceable under subsection G of NWCAA Regulation 155.8 and under the procedures of NWCAA Regulation Section 100. These conditions are not new source review approval conditions under Section 300 of the Agency's Regulations, RCW 70.94.152, the federal Clean Air Act or the Washington State Implementation Plan.

Mitigated Determination of Nonsignificance Terms and Conditions

34. Earth

    a. The applicant shall obtain coverage under and comply with the provisions of the Washington State Department of Ecology's (WDOE) Construction Stormwater General Permit (CSGP) for the management of erosion and sedimentation control during the construction phase of the Clean Fuels Project as required by the applicable laws. In accordance with the provisions of the CSGP, a Stormwater Pollution Prevention Plan (SWPPP) shall be prepared for the project and adaptively managed to address any identified on-site erosion control or sedimentation issues or changes in project design or construction. Plan modifications and monitoring shall be conducted by a Certified Erosion and Sediment Control Lead (CESCL) in accordance with the requirements of the CSGP. A copy of the completed SWPPP shall be submitted to NWCAA prior to commencement of construction.

35. AIR

    a. Develop and implement a comprehensive fugitive dust control plan to mitigate impacts during project construction. The plan shall be developed consistent with guidance provided in the Washington Association of General Contractors publication entitled "Guide to Handling Fugitive Dust from Construction Projects". The plan shall be submitted to NWCAA prior to commencement of construction.

    b. Appropriate approval to construct order(s) required under NWCAA Regulation Section 300 for minor criteria and toxic air pollutants from the Clean Fuels Project shall be obtained from the NWCAA prior to commencement of construction.

    c. Appropriate Prevention of Significant Deterioration permit approval(s) required under WAC 173-400-110 and/or 40 CFR Part 52 for major criteria air pollutants shall be obtained from the WDOE and/or U.S. EPA prior to commencement of construction.

    d. The energy efficiency and conservation measures set forth in the SEPA checklist shall be incorporated into the design and operation of the equipment such that the annual carbon dioxide emissions from the #2 Hydrogen Plant SMR Furnace stack shall not exceed 437,132 metric tons per cumulative 12-month rolling period. This limit is applicable only to the #2 Hydrogen Plant and includes the combination of the industrial process emissions generated from steam methane reforming and from products of combustion in the furnace. Ongoing compliance with this limit shall be demonstrated by installing and operating a continuous emission monitoring system (CEMS) for CO_2 in the stack. The CEMS shall be maintained and operated in accordance with the federal rule entitled Mandatory Reporting of Greenhouse Gases

(40 CFR 98). The cumulative 12-month rolling CO_2 emissions from the #2 Hydrogen SMR Furnace stack shall be reported to the NWCAA in monthly emissions reports.

e. Within six months of the startup date of the Clean Fuels Project, BP West Coast Products, LLC (BP) shall pay in full to the Northwest Clean Air Agency (NWCAA) $4,376,226. This payment is calculated based on twenty percent of the estimated carbon dioxide emissions from new units associated with the Clean Fuels Project and the project's effect on emissions from existing units projected over a 30-year period, operating at one hundred percent capacity, multiplied by $1.60 per metric ton of carbon dioxide (455,857 tonnes CO_2/year x 20% offset mitigation x 30 years x 100% capacity x $1.60). The NWCAA shall be notified in writing within 14 days of the startup date of the Clean Fuels Project. The startup date shall be considered the day that the #2 Hydrogen plant is commissioned for commercial operation. The NWCAA agrees to use funds acquired from this Mitigated DNS condition on global climate change mitigation projects. Further, the NWCAA agrees to provide an open public process for allocation of funds and secure review and approval by the NWCAA Board of Directors for such allocations.

36. Water

a. To prevent and minimize the occurrence and potential consequences of oil spills, the applicant shall construct the Clean Fuels Project in accordance with the refinery's Integrated Spill Prevention, Control and Countermeasures (SPCC) Plan as well as the Oil Handling Facility Operations Manual (OHFOM) prepared under the applicable federal and state requirements as set forth in 40 CFR Part 112 and WAC 173-180.

b. To reduce potential stormwater runoff impact, the applicant shall ensure that necessary infrastructure improvements to the refinery's Wastewater Treatment Plant (WWTP) are implemented to address minor increases in stormwater volume resulting from the construction of the Clean Fuels Project.

c. During the construction phase the applicant shall manage construction stormwater in accordance with the CSGP and the project SWPPP.

37. Animals

a. Disturbance of existing vegetation, beach substrate and natural habitat features (e.g. logs, large rocks, stumps) shall be kept to the minimum necessary to accommodate the temporary pier structure for the beach landing and the associated delivery of oversize equipment. Upon completion of the off-loading, the affected areas shall be restored to their pre-construction condition to the maximum extent practicable.

b. Prior to construction of the temporary pier for the beach landing, the applicant shall contact the Washington State Department of Fish and Wildlife (WDFW) to obtain a Hydraulics Project Approval (HPA) or any other approvals required as determined by WDFW.

38. Energy and Natural Resources

a. Potential impacts to energy and natural resources are mitigated in accordance with Condition 35 (Air) of this Order.

39. Aesthetics

    a. It is recognized that the project site and surrounding areas are zoned for industrial use and development; however, the applicant shall maintain the existing 100-foot setback/buffer (inclusive of a 20-foot cleared) security setback along the perimeter fence line on Grandview Road to help visually screen the Clean Fuels Project site from non-refinery users off-site. Existing trees and vegetation within the setback/buffer area shall be maintained to the maximum extent practicable to help minimize visual impacts.

40. Light and Glare

    a. The applicant shall prepare a lighting plan for the Clean Fuels Project to ensure that lighting is designed and installed in accordance with standard technical practices, taking into consideration operator safety and functionality. Where feasible, exterior lighting shall generally be constructed and/or screened in a manner so as to minimize potential off-site impacts from light or glare. Adjustment of light direction and/or use of supplemental light shields to provide additional screening may be used to minimize potential light spillover or direct glare in response to specific site conditions. The lighting plan shall be submitted to the NWCAA prior to completing construction of the Clean Fuels Project.

41. Historic and Cultural Preservation

    a. The applicant shall develop an Inadvertent Discovery Plan to be implemented in the event that significant historic and/or cultural resources are discovered during the construction of the Clean Fuels Project. In the event of an inadvertent discovery, all ground disturbing activities in the area of the discovery shall cease and the Lummi Nation Tribal Historic Preservation Office (LNTHPO), Nooksack Tribe and Washington State Office of Archaeology and Historic Preservation shall be contacted immediately to determine the significance of the discovery. If human remains are observed, the Whatcom County Sheriff (911) and the Lummi Nation Tribal Historic Preservation Office shall be contacted immediately. Compliance with all other applicable laws pertaining to archaeological resources is required.

42. Transportation

    a. The applicant shall obtain all appropriate state and local permits associated with the delivery of oversized equipment associated with the Clean Fuels Project prior to work within state/county right-of-way and movement of oversize equipment on state/county roads. Examples of such permits include a Revocable Encroachment Permit and Move Permit from Whatcom County Public Works and an Oversize/Overweight - Tractor Trailer - Single Trip Permit from the Washington State Department of Transportation (WSDOT). The delivery of oversized equipment shall be coordinated with the appropriate agencies with jurisdiction, such as, Whatcom County and the WSDOT and shall include the use of appropriate traffic control measures.

    b. To minimize traffic impacts during the construction phase of the Clean Fuels Project, the applicant shall implement the use of peak hour traffic reduction measures to the maximum extent feasible. Such measures may include the implementation of offset work schedules, increased use of vanpools, additional busses and the use of flaggers and signage at impacted intersections.

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